REMARKS

Claims 1 to 10, 12, 13, 15, 16, 18 and 19 were pending in the application at the time of the advisory action. Claims 1 to 10, 12, 13, 15, 16, 18 and 19 remain rejected as anticipated.

Claims 1, 2, 4, 5, 7, 8, 12, 15 and 18 are amended to more clearly recite the invention. The amendments are supported at least by the drawings.

Claims 10, 13 and 16 are cancelled.

Claims 1 to 10, 12, 13, 15, 16, and 18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0120864, hereinafter referred to as Wu. With respect to Claims 1, 4 and 7, the final rejection stated, in part:

> . . . Wu et al. discloses a method, program and apparatus for managing identification in a data communications network comprising a user-controlled secure storage device, enrolling user of the user controlled secure storage device with an authority network site, providing information requested, storing the data, enabling the user-controlled secure storage device to release user data and use the user data at a service provider network site to obtain a service. (See page 4, Sections 0040-042)

The Advisory Action further stated:

> . . . Wu et al. discloses a user-controlled secure storage device (i.e., repository server system) which is used to store user data and provide user interface control to the user when a request is made to perform services within the Web. (See page 4, Section 0042)

Applicants respectfully traverse the anticipation rejection of each of Claims 1, 4 and 7. Applicants again point out that for an anticipation rejection, the MPEP requires:

> "A Claim is anticipated only if each and every element as set forth in the Claim is found, either expressly or inherently described, in a single prior art

reference." . . . . . "**The identical invention must be shown in as complete detail as is contained in the ... claim.**" (Emphasis Added.)

MPEP § 2131, 8th Ed., Rev. 3, p. 2100-76 (August 2005)

Neither the rejection nor the comment in the advisory action shows how Wu teachings receiving a repository server system that was identified as the user-controlled secure storage device, according to the first element in these claims. In addition, even assuming that such a characterization was correct, this would teach away from a portable user controlled secure storage device. The cited paragraphs do not teach anything concerning such a device and so fail to anticipate Claims 1, 4 and 7. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claim 4 is a program storage device corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Claim 7 is a means-plus-function Claim corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Accordingly, the above comments with respect to Claim 1 are incorporated herein by reference for Claims 4 and 7. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 4 and 7.

With respect to Claims 2, 5 and 8, the final rejection stated, in part:

> . . . Wu et al. discloses a method, program and apparatus for managing identification in a data communications network comprising receiving a user-controlled secure storage device, enrolling user of the user-controlled secure storage device with authority network site, providing information requested, receiving the data in two portion comprising a cryptogram computed based on the second portion, storing the data, enabling the user-controlled secure storage device to release user data, and using the user data at a service provider network site to obtain a service. (See page 4, Sections 0044-0045)

The Advisory Action further stated:

> . . . Wu et al. discloses a means for encryption by
> using a encrypted-key token which gives the user control
> to access a device on the Web (See page 3, Section 0027
> and page 4, Section 0044)

Applicants respectfully traverse the anticipation
rejection of Claim 2. The above comments with respect to Claim
1 are also applicable to Claim 2 and are incorporated herein by
reference.

Paragraph [0027] of Wu stated:

> [0027] Yet another advantage of the present invention is
> that the information requests and transfers are routed
> through the user's computer. Encryption of the information
> released, as well as all information provided or edited by
> the user, is therefore enforced by the information server.
> For transactions between a user and partner site requiring
> or just desiring user-identity validation, the
> establishment of the information server account and
> subsequent authenticating email, postal, encrypted key-
> card contacts allows authentication of the client-user to
> the information server. This information may be securely
> passed directly to the partner site to authenticate a
> user. Alternately, the information server may provide its
> own authentication credentials to the partner site as a
> proxy for the client-user, where present and prior
> interactions between the information server and client-
> user are of a sufficient nature to warrant proxy
> validation.

This paragraph described encryption, but provides no
detail on how the encryption is done. Claim 2 recites in part:

> receiving user data in response to said enrolling,
> said user data comprising a first portion and a second
> portion, said first portion comprising a cryptogram
> computed based on said second portion

Thus, Claim 2 recites that the user data is received in
response to enrolling. Paragraph [0027] does not describe any
enrollment process. In addition, the user data in Claim 2 has

two portions and a specific relationship between the two portions is defined. Paragraph [0027] does not describe such data.

Paragraph [0044] of Wu stated:

[0044] To operate within the preferred embodiments of the present invention, the user is required to initially establish a user-account on the information server system 22. In establishing this account, the user is allowed to select or is assigned a unique user-identifier, such as a username and password. This identifier, potentially further based on an encrypted key token, is used to subsequently identify the user to a partner server system 16, 18, 20 that has established a partner-account with the information server system 22.

Again, this section described nothing about storage. Also an example of the identifier is given as "username and password." The paragraph also states "This identifier, potentially further based on an encrypted key token." This does not state that the identifier includes the encrypted key token and does not state that the encrypted key token is based on "a cryptogram computed based on said second portion." The two sections of Wu fail to suggest the operations recited in Claim 2, let alone show **"The identical invention . . . in as complete detail as is contained in the ... claim,"** as required by the MPEP for an anticipation rejection. The rejection failed to cite teachings at the same level of detail not only of the operations associated with the secure storage device, but also of the specific relationship of the user data. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 2.

Claim 5 is a program storage device corresponding to method Claim 2 and thus includes substantially the same distinctive feature as Claim 2. Claim 8 is a means-plus-function Claim corresponding to method Claim 2 and thus includes substantially the same distinctive feature as Claim 2. Accordingly, the above comments with respect to Claim 2 are

incorporated herein by reference for Claims 5 and 8.
Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 5 and 8.

With respect to Claims 3, 6 and 9, the final rejection
stated, in part:

> . . . Wu et al. discloses a method, program and apparatus
> for managing identification in a data communications
> network presenting an identity credential request and data
> to be stored to a federated identity server via a client
> host, receiving an identity credential in response to
> randomized ID and receiving a logon credential in response
> to the service request (See pages 5-6, Section 0047 and
> Sections 0053-0054)

The Advisory Action further stated:

> . . . Wu et al. discloses an identity credential in
> response to randomized ID by allowing the user to securely
> pass information as authentication credentials to the
> service provider to authenticate the user, wherein the
> user-identity becomes validated (See page 3, Section 0027)

Applicants respectfully traverse the anticipation rejection of
Claim 3. Applicants respectfully note that the advisory failed
to address the numerous deficiencies noted in the response to
the final rejection. Further, Claim 3 first recites:

> presenting an identity credential request and data to be
> stored to a federated identity server via a client host

Thus, two elements are presented to the federated identity
server, a request and data to be stored. None of the
rejections nor the advisory action identifies what is
considered to be the data to be stored. Further, the claim
continues:

> receiving an identity credential in response to said
> identity credential request, said identity credential
> comprising a randomized ID and an identification authority

ID, <u>said federated identity server capable of verifying</u>
<u>the truthfulness, accuracy and completeness of said data</u>
<u>to be stored</u>   (Emphasis Added)

The rejection has not cited any teaching of presenting the
combination of elements or of any server having the capability
recited in the Claim. Paragraph [0027], as quoted above, does
not mention storage of data or verifying the truthfulness,
accuracy and completeness of the data to be stored. The MPEP
requires that Wu teach each of these three elements in the same
level of detail as recited in the Claim.

Further, while Wu does state that the user can submit and
store personal information in Paragraph [0045], there is no
teaching that the server is "<u>capable of verifying the</u>
<u>truthfulness, accuracy and completeness of said data to be</u>
<u>stored.</u>"

Further, the cited section of Wu in the advisory action
does not include the word "randomized" and does not include any
description of "verifying the truthfulness, accuracy and
completeness of <u>said data to be stored.</u>" Wu fails to satisfy
the requirements of the MPEP, as quoted above. Thus, the
anticipation rejection of Claim 3 is still defective for
multiple reasons. Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
Claim 3.

Claim 6 is a program storage device corresponding to
method Claim 3 and thus includes substantially the same
distinctive feature as Claim 3. Claim 9 is a means-plus-
function Claim corresponding to method Claim 3 and thus
includes substantially the same distinctive feature as Claim 3.
Accordingly, the above comments with respect to Claim 3 are
incorporated herein by reference for Claims 6 and 9.
Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 6 and 9.

Claims 10, 13 and 16 are cancelled and so the anticipation
rejection of these claims is rendered moot.

With respect to Claims 12, 15, and 18, the final rejection
stated, in part:

> . . . Wu et al. discloses a method for protecting privacy
> on a data communications network, storing user logon
> information for at least one service provider on a user-
> controlled secure device, the least one service provider
> server comprising at least one network server providing a
> service to a user, and logging on the device, and logging
> on providing access to the least one service provider
> server.. (See pages 7-8, Sections 0065-0068)

The Advisory Action further stated:

> . . . Wu et al. discloses a user-controlled secure storage
> device (i.e., repository server system) (See page 4,
> Section 0042).

Applicants respectfully traverse the anticipation
rejection of Claim 12. The above comments with respect to
Claim 1 are applicable to Claim 12 and so will not be repeated
but incorporated herein by reference. Applicants respectfully
request reconsideration and withdrawal of the anticipation
rejection of Claim 12.

Claim 15 is a program storage device corresponding to
method Claim 12 and thus includes substantially the same
distinctive feature as Claim 12. Claim 18 is a means-plus-
function Claim corresponding to method Claim 12 and thus
includes substantially the same distinctive feature as
Claim 12. Accordingly, the above comments with respect to
Claim 12 are incorporated herein by reference for Claims 15 and
18. Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 15 and 18.

Claim 19 is rejected under 35 U.S.C. 102(b) as being
anticipated by Ming-Chuan Wu et al., "Encoded Bitmap Indexing

for Data Warehouses," hereinafter referred to as Wu. The rejection stated in part:

> . . . a data structure stored in the memory, the data structure including a bit-mapped in the field determined by whether the user is a member of a group associated with the bit, the mapping for between bits in the field and membership in a group maintained by an aggregation authority. (See Abstract, page 220, and Section 2.1)

The Advisory Action did not address the rejection of Claim 19. Accordingly, Applicants respectfully traverse the anticipation rejection of Claim 19. As stated previously:

> Applicant expressly traversed this rejection and the traverse was not even acknowledged in the final office action. Accordingly, the final office action is incomplete and should be withdrawn. Moreover, since the comments were not rebutted, it is an admission that Applicants' remarks were correct and so this claim should have been allowed.
>
> Again, based upon the above quotation from the MPEP, the requirement for a reference is not that the reference teach some general abstract concept related to the invention, but rather the reference **must show** "The identical invention in as complete detail as is contained in the ... claim."
>
> Wu describes generally the concept of using "simple bitmap indexing and the application domain for which it is ideally suited." The application domain is defined by abstract mathematical concepts and is not related by Wu to "membership in a group." Further, the rejection cited no teaching of "the mapping for between bits in said field and membership in a group maintained by an aggregation authority," but simply paraphrased the claim language. Accordingly, the rejection failed to meet the criteria required by the MPEP for an anticipation rejection. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 19.

//

//

//

//

//
//

Claims 1 to 9, 12, 15, 18 and 19 remain in the application. Claims 1, 2, 4, 5, 7, 8, 12, 15 and 18 are amended. Claims 10, 13, and 16 are cancelled. Claims 11, 14 and 17 were previously cancelled. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on March 1, 2006.

Respectfully submitted,

Forrest Gunnison
Attorney for Applicant(s)
Reg. No. 32,899
Tel.: (831) 655-0880

_____   **March 1, 2006**

Attorney for Applicant(s)   Date of
Signature